

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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June 5, 2025

By ECF and Email

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Caleb Eccles-Gonsalves
24 Cr. 391 (RMB)**

MEMO ENDORSED

Dear Judge Berman,

I write to respectfully request that the Court adjourn the motions deadline in the above-captioned case for an additional two weeks: defense motions due June 18, government responses due July 8, replies due July 15; and the July 30 conference for ruling on the motions adjourned to any date that is convenient to the Court.

The parties are in the final stages of negotiating a disposition of this case; the government extended a new plea offer on Monday, June 2. The requested adjournment will give us an opportunity to review the new offer and potentially resolve this case before motions are filed.

The government, by Assistant United States Attorney Ashley Nicolas, consents to this application.

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Counsel for Caleb Eccles-Gonsalves

Application granted except	
that let's keep the 7/30/25	
conference.	
SO ORDERED:	Richard M. Berman
Date: 6/5/25	Richard M. Berman, U.S.D.J.